

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
*Norfolk Division*

|                             |   |                            |
|-----------------------------|---|----------------------------|
| UNITED STATES OF AMERICA    | ) |                            |
|                             | ) |                            |
| v.                          | ) | CRIMINAL NO. 2:16cr128-001 |
|                             | ) |                            |
| CHADWICK STANLEY GHESQUIERE | ) |                            |
| Defendant                   | ) |                            |

GOVERNMENT'S POSITION ON SENTENCING  
SENTENCING UNDER 3553(A) FACTORS

Dana J. Boente, United States Attorney for the Eastern District of Virginia, and Kevin M. Comstock, Assistant United States Attorney, pursuant to the United States Sentencing Guidelines, 18 U.S.C. § 3553(a), *United States v. Booker*, 125 S. Ct. 738 (2005) and the local rules, represents that it has reviewed the Probation Officer's presentence report; and state first we agree in all respects with the factual findings under the preponderance of the evidence standard, second we move under USSG § 3E1.1(b) for an additional one-point, and third we submit that an advisory guideline sentence including incarceration is appropriate under the § 3553(a) factors. The Assistant U.S. Attorney will request to make a brief argument and may seek to introduce selected case photo exhibits at sentencing regarding a recommendation under the § 3553(a) factors.

Respectfully submitted,

DANA J. BOENTE  
UNITED STATES ATTORNEY

By: \_\_\_\_\_/s/  
Kevin M. Comstock  
Assistant United States Attorney  
Virginia State Bar 39460  
United States Attorney's Office  
101 West Main Street, Suite 8000  
Norfolk, Virginia 23510  
Office Number - (757) 441-6331  
Facsimile Number - (757) 441-6689  
Email Address: [Kevin.Comstock@usdoj.gov](mailto:Kevin.Comstock@usdoj.gov)

**CERTIFICATE OF SERVICE**

I certify that on this 21<sup>st</sup> day of December, 2016, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

Keith Loren Kimball, Esquire  
150 Boush Street  
Suite 403  
Norfolk, Virginia 23510

I certify that on this this 21<sup>st</sup> day of December, 2016, I caused a true and correct copy of the foregoing Position of the Government with Respect to Sentencing Factors to be either *mailed* or *emailed* to the following:

Carmen I. Perez  
U.S. Probation Officer  
600 Granby Street  
Suite 200  
Norfolk, Virginia 23510

By: \_\_\_\_\_/s/\_\_\_\_\_  
Kevin M. Comstock  
Assistant United States Attorney  
Virginia State Bar 39460  
United States Attorney's Office  
101 West Main Street, Suite 8000  
Norfolk, Virginia 23510  
Office Number - (757) 441-6331  
Facsimile Number - (757) 441-6689  
Email Address: [Kevin.Comstock@usdoj.gov](mailto:Kevin.Comstock@usdoj.gov)